

1 GARY E. SCHNITZER, ESQ.  
Nevada Bar No. 395  
2 KRAVITZ, SCHNITZER & JOHNSON, CHTD.  
8985 South Eastern Avenue, Suite 200  
3 Las Vegas, Nevada 89123  
Telephone: (702) 222-4142  
4 Facsimile: (702) 362-2203  
Email: gschnitzer@ksjattorneys.com  
5 *Attorney for Defendant*  
*LexisNexis Risk Solutions Inc.*

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7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 DALE C. BURNS,

12 Plaintiff,

13 v.

14 EARLY WARNING SERVICES, LLC  
15 LEXISNEXIS RISK SOLUTIONS INC.,

16 Defendants.

Case No. 2:19-cv-02142-RFB-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME TO ANSWER OR OTHERWISE  
PLEAD**

**(FIRST REQUEST)**

17  
18 Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada,  
19 Defendant LexisNexis Risk Solutions Inc. ("Defendant") and Plaintiff Dale C. Burns ("Plaintiff")  
20 (collectively "the Parties"), by and through their respective counsel, stipulate as follows:

21 1. Plaintiff filed the First Amended Complaint for Damages on December 18, 2019.

22 2. Defendant was served with the First Amended Complaint for Damages on  
23 December 19, 2019.

24 3. Defendant's deadline to answer or otherwise respond to Plaintiff's First Amended  
25 Complaint was January 9, 2020.

26 4. The undersigned counsel for Defendant was recently retained, and is in the process  
27 of obtaining proper documents in order to address specific allegations made in Plaintiff's First  
28 Amended Complaint.

1           5.       The Parties agreed to an extension for Defendant to answer or otherwise respond  
2 to Plaintiff's First Amended Complaint on January 8, 2020, allowing Defendant to formulate a  
3 response up to and including February 10, 2020.

4           6.       This is the first request by Defendant seeking such extension.

5           In consideration of the foregoing, and for good cause, it is hereby STIPULATED AND  
6 AGREED by and between the Parties, that Defendant LexisNexis Risk Solutions Inc. shall have up  
7 to and including February 10, 2020 to file an answer or otherwise respond to Plaintiff's First  
8 Amended Complaint.

9           **IT IS SO STIPULATED**

10          Dated this 30th day of January, 2020.

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12       /s/ Miles N. Clark, Esq.

13       Matthew I. Knepper, Esq.  
14       Nevada Bar No. 12796  
15       Miles N. Clark, Esq.  
16       Nevada Bar No. 13848  
17       KNEPPER & CLARK LLC  
18       5510 S. Fort Apache Rd., Suite 30  
19       Las Vegas, NV 89148-7700  
20       Telephone: (702) 856-7430  
21       Facsimile: (702) 447-8048  
22       Email: [matthew.knepper@knepperclark.com](mailto:matthew.knepper@knepperclark.com)  
23       Email: [miles.clark@knepperclark.com](mailto:miles.clark@knepperclark.com)

24       David H. Krieger, Esq.  
25       Nevada Bar No. 9086  
26       HAINES & KRIEGER, LLC  
27       8985 S. Eastern Ave., Suite 350  
28       Henderson, NV 89123  
Telephone: (702) 880-5554  
Facsimile: (702) 385-5518  
Email: [dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)  
*Attorneys for Plaintiff*  
*Dale C. Burns*

/s/ Gary E. Schnitzer, Esq.

      Gary E. Schnitzer, Esq.  
      Nevada Bar No. 395  
      KRAVITZ, SCHNITZER & JOHNSON, CHTD.  
      8985 South Eastern Avenue, Suite 200  
      Las Vegas, Nevada 89123  
      Telephone: (702) 222-4142  
      Facsimile: (702) 362-2203  
      Email: [gschnitzer@ksjattorneys.com](mailto:gschnitzer@ksjattorneys.com)  
      Attorney for Defendant  
      Lexis Nexis Risk Solutions Inc.

**IT IS SO ORDERED.**

  
      \_\_\_\_\_  
      United States Magistrate Judge

      Dated this 3rd day of February, 2020.